

27 March 2019

TO: Rep. Ken Helm, Chair, and House Committee on Energy and Environment

FROM: Tracy Farwell, ESF Action Committee

Ed Averill, ESF Action Committee

SUBJECT A: HB 2855 – Granting Authority to the Oregon Public Utilities Commission to Support Oregon Emissions Goals

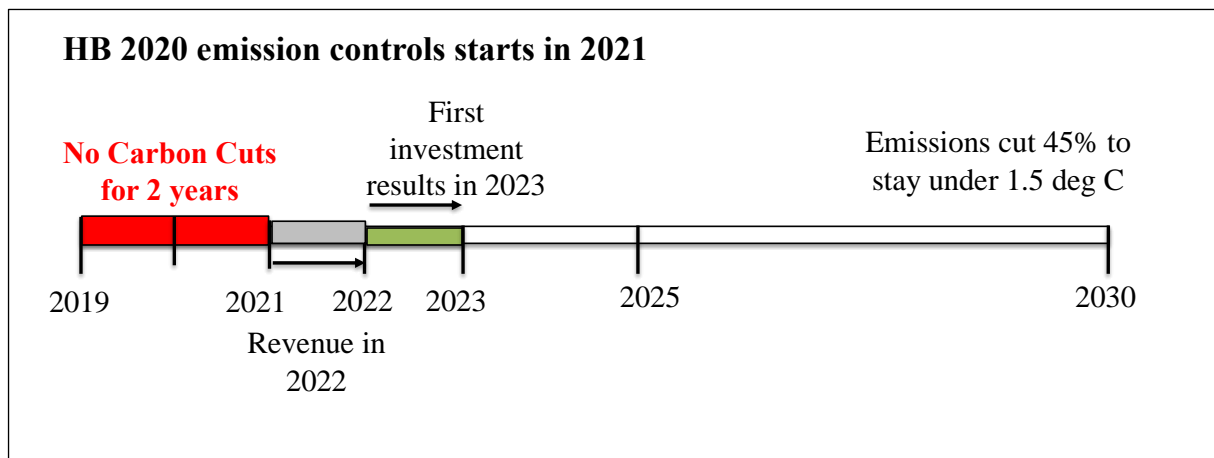
SUBJECT B: Amend HB 2855 – Define Best Available Science and Set Utility Planning Criteria Including a Decarbonization Budget

How Much Can Oregon Accomplish With Climate Action?

Science calls for reduction of all carbon emissions to zero in 2050 otherwise there is excessive existential threat for all species we are familiar with. Timely and effective action is not discretionary.

Avoiding Statutory Delay in Salem

Engineers for a Sustainable Future is increasingly aware of the consequence of complex bills when passed by the Legislature: enactment is deferred by years of rulemaking. When Oregon has never met a climate goal, such a delay is particularly counterproductive. By the time we reach 2030 best science calls for reduction of carbon emissions of at least 45% of today’s emissions. Regrettably, more delay means more climate damage on the way.



Oregon Senator Cliff Bentz, in discussing HB 2020, puts it plainly. “The value of this bill is its ability to convince other people to follow Oregon’s lead. And this means we have to get it right. It’s not going to save the world. What saves the world is other people saying, ‘Hey, Oregon figured out how to do it.’”

Clearly, statutory delay is a common barrier affecting every state and nation. Our proposed solution conserves precious calendar.

While it is very likely that industry is looking ahead and will invest in technology that reduces carbon emissions, we need a clear signal from Salem that this is more than optional.

A simple extension of the mission of the Oregon Public Utilities Commission to consider **least carbon emissions** along with least cost in utility planning will avoid inaction on emissions. This is the concept for 2019 HB 2855, and it can be enacted in a matter of months not years. Utilities produce 46% of Oregon’s carbon emissions regulated under the terms of HB 2020. [Emission Sources Covered by the Cap](#)

Best Available Science

To strengthen the language in the current version of HB 2855 Engineers for a Sustainable Future seek endorsement of the following amendment that adds a formal definition of best available science:

“Best available science” means “science that (A) maximizes the quality, objectivity, and integrity of information, including statistical information; (B) uses peer-reviewed and publicly available data; and (C) clearly documents and communicates risks and uncertainties in the scientific citations.” [RESTORE Act; Subtitle F of Public Law 112-141](#)

Early Change in PUC Administrative Policy

Policy changes that align the PUC with Oregon climate goals are not a mystery. The following policy option amendments are needed without delay and are fully justified by current best science.

Para #
Utility Planning

Decision criteria employed by the Commission for utility planning shall include

- 1) least possible social cost and least carbon emissions,
- 2) fleet vehicle electrification leading to 95% zero emission fleet in 2030.

Para #
Utility Decarbonization

The Commission shall research and decide a declining carbon budget tailored to each utility with mandated set points in 2030 and 2050, beyond which the utility shall

- 1) deliver energy from zero-fuel sources,
- 2) provide sources of additional energy storage,
- 3) build out utility electric vehicle fleets and vehicle charging infrastructure.